

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

IN RE	)	
	)	
ALEXANDER E. JONES	)	CASE No. 22-33553
	)	
DEBTOR.	)	(CHAPTER 11)
	)	
	)	JUDGE CHRISTOPHER M. LOPEZ

**FIRST AMENDED MONTHLY FEE STATEMENT OF JORDAN & ORTIZ, P.C. FOR  
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AS  
CO-COUNSEL TO THE DEBTOR FOR THE PERIOD FROM  
DECEMBER 1, 2022 THROUGH DECEMBER 31, 2022**

Name of Applicant:	Jordan & Ortiz, P.C. (“J&O”)	
Applicant’s Role in Case:	Co-Counsel to Debtor	
Date Order of Appointment Signed:	January 20, 2023 (Dkt #105)	
	Beginning of Period	End of Period
Time Period Covered in Statement:	12/01/2022	12/31/2022
Summary of Total Fees and Expenses Requested		
Total Fees Requested in this Statement:	\$61,890.00 <sup>1</sup> (80% of \$77,362.50)	
Total Reimbursable Expenses Requested in this Statement:	\$506.65 <sup>2</sup>	
Summary Attorney Fees for the Period Covered by this Statement		
Attorneys Fees in this Statement:	\$77,362.50	
Total Actual Attorneys Hours Covered by this Statement:	128.50	
Average Hourly Rate for Attorneys:	\$596.54	
Summary Paraprofessional Fees for the Period Covered by this Statement		
Paraprofessional Fees Requested in this Statement:	\$525.00	
Total Actual Paraprofessional Hours Covered by this Statement:	2.10	
Average Hourly Rate for Paraprofessionals:	\$250.00	

<sup>1</sup> Counsel is holding \$146,790.16 as a retainer in its IOLTA Account which is included in this fee/expense request.

<sup>2</sup> The date listed for expenses contained in the attached does not necessarily reflect the date on which the expense was actually incurred by Applicant.

**In accordance with the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106], each party receiving notice of the monthly fee statement will have 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14 day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.**

### **RELIEF REQUESTED**

1. This is Jordan & Ortiz, P.C.'s ("J&O") first monthly fee statement for compensation (the "Fee Statement") for the period of December 1, 2022 through December 31, 2022 (the "Fee Period") was originally filed on January 27, 2023 [ECF #129] pursuant to the Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals [ECF #106] (the "Interim Compensation Order"). J&O is filing its first amended monthly fee statement for compensation showing that J&O requests: (a) allowance of compensation in the amount of \$61,890.00 (80% of \$77,362.50) for actual, reasonable, and necessary professional services rendered to the Debtor by J&O and (b) reimbursement of actual, reasonable, and necessary costs and expenses in the amount of \$506.65 incurred by J&O during the Fee Period. By this Fee Statement, J&O seeks interim allowance of compensation for services rendered and reimbursement of expenses incurred solely in connection with its work performed on behalf of the Debtor.

### **SERVICES RENDERED AND DISBURSEMENTS INCURRED**

2. Attached above as Exhibit "A" is the Fee Statement for the period December 1, 2022 through December 31, 2022, which includes a summary of professionals who rendered services to the Debtor during the Fee Period, including each person's billing rate and the fees incurred during the Fee Period summarized by task code and the itemized schedule of expenses

within each category, including description, incurred with the amounts for which reimbursement is requested. Attached as Exhibit “B” is a Task Code breakdown by Attorney and Paralegal.

### NOTICE AND OBJECTION PROCEDURES

3. Pursuant to the Interim Compensation Order notice of this Fee Statement has been provided to:

- a. Debtor Counsel, Crowe & Dunlevy, PC, 2525 McKinnon St, Ste. 425, Dallas, TX 75201 (Attn: Vickie L. Driver, [dallaseservice@crowedunlevy.com](mailto:dallaseservice@crowedunlevy.com))
- b. U.S. Trustee c/o/ Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St Ste 3516 Houston, TX 77002, [ha.nguyen@usdoj.gov](mailto:ha.nguyen@usdoj.gov), [jayson.b.ruff@usdoj.gov](mailto:jayson.b.ruff@usdoj.gov)
- c. Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; [dzensky@akingump.com](mailto:dzensky@akingump.com), [mbrimmage@akingump.com](mailto:mbrimmage@akingump.com), [sbrauner@akingump.com](mailto:sbrauner@akingump.com), [melanie.miller@akingump.com](mailto:melanie.miller@akingump.com))
- d. Connecticut Plaintiffs, (a) Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, [ASterling@koskoff.com](mailto:ASterling@koskoff.com)) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, [kkimpler@paulweiss.com](mailto:kkimpler@paulweiss.com), [msalvucci@paulweiss.com](mailto:msalvucci@paulweiss.com))
- e. Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, [avi.moshenberg@mhllp.com](mailto:avi.moshenberg@mhllp.com)) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, [Jarrod.Martin@chamberlainlaw.com](mailto:Jarrod.Martin@chamberlainlaw.com))
- f. All parties that receive ECF notifications

In light of the nature of the relief requested herein, J&O submits that no further or other notice is required.

4. Pursuant to the Interim Compensation Order (ECF #106), the Notice Parties and parties in interest have 14 days after service of the Monthly Fee Statement to object to the requested fees and expenses. If any Notice Party, or any other party in interest, objects to a Retained

Professional's Monthly Fee Statement, it must serve on the affected Retained Professional and each of the other Notice Parties a written objection (the "Objection") so that it is received on or before the Objection Deadline. Thereafter, the objecting party and the affected Retained Professional may attempt to resolve the Objection on a consensual basis. If the parties are unable to reach a resolution of the Objection within 14 days after service of the Objection, or such later date as may be agreed upon by the objecting party and the affected Retained Professional, the affected Retained Professional may either: (i) file a response to the Objection with the Court, together with a request for payment of the difference, if any, between the Maximum Payment and the Authorized Payment made to the affected Retained Professional (the "Incremental Amount") and schedule such matter for hearing on at least 14 days' notice; or (ii) forego payment of the Incremental Amount until the next interim or final fee application hearing, at which time the Court will consider and dispose of the Objection if requested by the affected Retained Professional. Failure by a Notice Party, or any other party in interest, to object to a Monthly Fee Statement shall not constitute a waiver of any kind nor prejudice that party's right to object to any Interim Fee Application (as defined below) subsequently filed by a Retained Professional.

5. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. J&O reserves the right to make further application to this Court for allowance of such fees and expenses not included herein, or correct and erroneous or errors set out herein. Subsequent Monthly Fee Statements will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Interim Compensation Order.

WHEREFORE, pursuant to the Interim Compensation Order, and pending the expiration

of the objection deadline, if no objections to the Fee Statement are received, J&O respectfully requests: (a) that it be allowed on an interim basis (i) \$61,890.00 (80% of fees in the amount of \$77,362.50) for reasonable, actual and necessary services rendered by it on behalf of the Debtor during the Fee Period and (ii) reimbursement of \$506.65 for reasonable, actual and necessary expenses incurred during the Fee Period; (b) that the Debtor be authorized and directed to immediately pay to J&O the amount of \$62,396.65 which is equal to the sum of 80% of J&O's fees and 100% of J&O's expenses incurred during the Fee Period, and (c) and granting such other and further relief as the Court may deem just and proper.

Dated: February 3, 2023

/s/ Shelby A. Jordan  
SHELBY A. JORDAN  
State Bar No. 11016700  
S.D. No. 2195  
ANTONIO ORTIZ  
State Bar No. 24074839  
S.D. No. 1127322  
***Jordan & Ortiz, P.C.***  
500 North Shoreline Blvd., Suite 900  
Corpus Christi, TX 78401  
Telephone: (361) 884-5678  
Facsimile: (361) 888-5555  
Email: [sjordan@jhwclaw.com](mailto:sjordan@jhwclaw.com)  
[aortiz@jhwclaw.com](mailto:aortiz@jhwclaw.com)  
Copy to: [cmadden@jhwclaw.com](mailto:cmadden@jhwclaw.com)  
**CO-COUNSEL FOR DEBTOR**

### CERTIFICATE OF SERVICE

I certify that on February 3, 2023, a true and correct copy of the foregoing pleading was served upon the parties listed on the attached service list via the Court's ECF system and pursuant to Local Rule 9003-1, via e mail or U.S. mail as follows:

- a. Debtor Counsel, Crowe & Dunlevy, PC, 2525 McKinnon St, Ste. 425, Dallas, TX 75201 (Attn: Vickie L. Driver, [dallaseservice@crowedunlevy.com](mailto:dallaseservice@crowedunlevy.com))
- b. U.S. Trustee c/o/ Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St Ste 3516 Houston, TX 77002, [ha.nguyen@usdoj.gov](mailto:ha.nguyen@usdoj.gov), [jayson.b.ruff@usdoj.gov](mailto:jayson.b.ruff@usdoj.gov)
- c. Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; [dzensky@akingump.com](mailto:dzensky@akingump.com), [mbrimmage@akingump.com](mailto:mbrimmage@akingump.com), [sbrauner@akingump.com](mailto:sbrauner@akingump.com), [melanie.miller@akingump.com](mailto:melanie.miller@akingump.com))
- d. Connecticut Plaintiffs, (a) Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, [ASterling@koskoff.com](mailto:ASterling@koskoff.com)) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, [kkimpler@paulweiss.com](mailto:kkimpler@paulweiss.com), [msalvucci@paulweiss.com](mailto:msalvucci@paulweiss.com))
- e. Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, [avi.moshenberg@mhllp.com](mailto:avi.moshenberg@mhllp.com)) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, [Jarrod.Martin@chamberlainlaw.com](mailto:Jarrod.Martin@chamberlainlaw.com))
- f. All parties that receive ECF notifications

/s/ Shelby A. Jordan

Shelby A. Jordan

**AMENDED EXHIBIT “A”**

**JORDAN & ORTIZ, P.C. DECEMBER INVOICE FOR PERIOD  
DECEMBER 1, 2022 THROUGH DECEMBER 31, 2022**

JORDAN & CRITZ, P.C.  
 500 N. SHORELINE BLVD, SUITE 900  
 CORPUS CHRISTI, TEXAS 78401-0341  
 TAX ID NO. 74-2553880  
 (361) 884-5678

JONES, ALEX  
 alexejones1777@gmail.com

Page: 1  
 January 27, 2023  
 Account No: 5481-002000M  
 Statement No: 922199

## Bankruptcy

					Hours
12/02/2022	CRM	B110	A103	Draft/revise notice of appearance for Shelby Jordan as counsel for Alex Jones and file same.	0.50
	SAJ	B110	A108	Conference with C&D on all pending issues of filing and emails discussing filing and review final documents and office conference with client for final approval (3.4); telephone conference with client and in office regarding filing approval (1.2); telephone conference with client and in office regarding filing and filing statements and schedules (0.2); work on statement to employees regarding Ch 11 filing (0.3); work on audience statement for TAJ show (0.1); discuss status of filing of notice an initial status conference and notices (work on matrix issues and parties in interest) with client appearing (0.2); work on gathering all documents, scheduling Monday for meeting with CRO and parties having books and records (0.4); telephone meeting with Bob Roe (0.3); work on documents for Monday schedule for meeting with co-counsel in Austin (0.3).	6.20
	SAJ	B190	A107	Conference with Pattis regarding status of judgment and appellate timing (0.6); receive and review new Conn pleadings and emails to and from Texas trial counsel (0.4); work on conflicts of law and conflicts of threatened sua sponte seizure over parties not before the Conn court (Jones affiliates as "property of the estate") (0.8); work on notice of auto stay regarding entry of agreed lift stay to coordinate with FSS and its agreed lift stay to coordinate appellate timelines and deadlines (0.3).	2.10
12/03/2022	SAJ	B110	A103	Work on draft V1 and V2 of Debtor's Initial Status Report (2.2); emails to new CRO, co-counsel regarding Monday schedule and meeting arranged for preparation of accounting and schedules and for initial status report and initial status conference with Court (0.3); review recent new quotes from Plaintiffs' counsel for appeal issues (0.2); begin to work on issues of debtor pre-petition draws and asset schedules for net worth (2.1).	4.80



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					Hours
12/04/2022	SAJ	B410	A106	Meeting with client to work on issues regarding all bank accounts and meeting with PQPR to understand access and working relationship to all accounts (1.0); call to ESG regarding status and timing of post-petition work (0.2); work on issues of DIP conduct and accounting with client (0.4)	1.60
	SAJ	B120	A104	Continue to work on organizing assets and affiliate entities and affiliate entities for new CRO and gather information on all affiliate entities transactions and compare to discovery/deposition review to assure thoroughness.	2.00
	SAJ	B310	A103	Work on claims bar date and circulate to co-counsel with proposed order (1.3); work on claims analysis issues and plan confirmation issues (0.6); estimation and claims bar dates process and procedures (0.2); begin work on status report for court on administrative claims of debtor due from FSS (0.2).	2.30
	SAJ	B210	A108	Conference with PQPR regarding all affiliate and related bank accounts and business records.	0.60
12/05/2022	SAJ	B110	A107	Conference with co-counsel on all asset issues and accounting issues involving schedules and statements of affairs, listing of assets including opportunities (1.6); download multiple files and discuss with CRO team regarding initial accounting and analysis of actual net worth, schedules or draws (checking for actual business expenses designated as a draw (0.2); prepare edits to initial status conference reports and circulate (0.3); work on demonstrative of draws and average draws per year (0.3).	2.40
	SAJ	B210	A106	Conference with client regarding bank accounts (0.4); call and arrange appointment and conference call with Bob Roe regarding meeting schedule tomorrow and accounting issues to meet with CRO team (0.3)	0.70
	SAJ	B410	A106	Conference with client regarding all current operations and issues of DIP and how to deal with post-petition ESG agency and accomplish regarding past, current and future investment in inventory purchases for consignment to FSS (1.2); how to organize bank accounts and how to insure accurate inventory for storage rooms with property of the estate (0.3); work on scheduling inventory and appraisal issues and set up meeting with Debtor and new CRO;(0.5)	2.00
	SAJ	B185	A107	Conference with co-counsel regarding salary contract, indemnity and motion to assume or reject executory contracts including employment agreement evidence (0.2); conference with Battaglia regarding salary budget expenses adjustment and timing and indemnity agreement (0.2).	0.40
	SAJ	B190	A103	Work on pleading for estimation of claims (0.4); prepare and	

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				Hours
			circulate memo in connection with issues of discharge (0.2).	0.60
	SAJ	B190	A104 Work on a respond to suggestion of bankruptcy filed in Travis County and pull research and update holding such filing not an "appearance" in the removed case (0.5); pull research and send to parties and Plaintiffs' counsel that notice only is required to invoke the automatic stay (0.6); conference with Andino Reynal regarding his appellate issues (0.3).	1.40
	SAJ	B185	A106 Conference with client regarding status of expectancy.	0.40
12/06/2022	SAJ	B110	A106 Meeting with client and CRO and meeting with co-counsel and CRO and conference with client in office regarding handling and accounting for all cash, handling payment of bills and accurate reporting of all credit card charges (2.4); conf with client re: handling contracts income and new contract opportunities (0.6); conference with Bob Roe regarding historical operations, historical records and other accounting issues (0.7); review and circulate email and memo on Rule 2019(b) BRP to require all creditor counsel representing more than one client to file verified statement (0.2)	3.90
	SAJ	B120	A103 Work on debtor asset summaries and conference with CRO regarding appraisals to the Ranch and Lake Travis house.	0.20
	SAJ	B140	A107 Conference with co-counsel regarding motion for relief from stay regarding FSS stay through entry of judgment and impact on creating two appeal proceedings.	0.50
	SAJ	B185	A104 Work on issues of default by FSS and enforcement of Debtor's employment contract with FSS (0.4); review draft for edits; conference with debtor (0.4).	0.80
	SAJ	B190	A103 Circulate detailed memo on 5th Circuit case regarding final judgments only and pull authority that a Federal court case filing included a bankruptcy or a contested matter objection to a claim or seeking estimation of claims and determining discharge actions (1.7). Begin outline for mediation statement including these points (1.0).	2.70
	SAJ	B190	A104 Work on and research appellate issues for state court stay issues (0.4); circulate to co counsel along with research on filing suggestion of bankruptcy and non-appearance in case (0.3); pull and forward case for violation of auto stay for any non-ministerial action by court or parties and liability of counsel in removal (0.4).	1.10
12/07/2022	CRM	B190	A109 Prepare, appear (remotely) and attend status conference.	0.60
	SAJ	B110	A109 Houston meeting with Liz Freeman and meeting with co-counsel to prepare and attend hearing on initial status	

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				Hours
			conference (3.0); conference with client regarding status report (no travel included) (0.2); post hearing telephone conference with client re: hearing outcome (0.1).	3.30
	SAJ	B310	A104 Research and memo preparation regarding standard of proof and mediation statement inclusion (1.4); analysis of each cause of action in Texas and Conn compensatory damages and default for each of Texas and Conn punitive damages standard of proof (1.5); impact of limitations on standard of proof (0.2).	3.10
	SAJ	B195	A109 Trip to Houston to attend status conference (billed at half).	2.60
12/08/2022	SAJ	B110	A106 Conference with client regarding status of donations accounts and assure account handling and deposit in DIP account.	0.70
	SAJ	B120	A104 Continue to review of documents for schedules and statements (0.8); emails to new CRO and two meeting with debtor to organize and document various assets and asset opportunities with "brand" and with affiliates (1.2).	2.00
	SAJ	B140	A107 Conference with Battaglia and work on issues of appeal and entry of judgments coordinated between the two debtors to avoid two-track appeal in same case.	0.80
	SAJ	B190	A107 Conference with Norm Pattis regarding status of appeal issues for Conn appeal and status of retainer and costs to be incurred.	0.40
	SAJ	B110	A107 Conference with Norm Pattis regarding status of contribution account and location and turn over to estate.	0.70
	SAJ	B210	A103 Work on DIP budget issues and stop charges by FSS to DIP account for internet access.	0.70
	SAJ	B110	A107 Email to debtor CRO (0.2); call and emails to co-counsel regarding pull down hearing on salary and prepare for hearings on 16th and 19th and 341 meeting (0.5).	0.70
12/09/2022	SAJ	B110	A107 Telephone conference with co-counsel to prepare for next week work by CRO with debtor (0.8); memo on discussion re: Friday hearing and planning, strategy, zoom and related issues (0.5).	1.30
	SAJ	B120	A104 Work on 2017 to current asset and asset opportunities-transactions for valuation and scheduling.	1.20
	SAJ	B310	A103 Prepare V1 mediation memo on claims estimation/dischargeability and full review and determination of non-tort "claims" (Defamation and bankruptcy court's jurisdiction to determine) and intentional infliction as a personal injury claim and work on mediation statement V8 (3.6).	3.60

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					Hours
	SAJ	B190	A103	Work on V9 of mediation statement and summary of BR strategy; circulate.	2.40
12/10/2022	SAJ	B190	A103	Work on V10 of mediation statement section on summary and strategy of debtor's Chapter 11 case (2.0); incorporate edits and changes from co-counsel (0.2).	2.20
12/12/2022	SAJ	B110	A106	Conference with client regarding week scheduling, meeting regarding additional information on assets and transactions (1.0); review of last two depositions referencing assets (.6).	1.60
	SAJ	B110	A107	Conference with Steve Lemmon regarding access to PQPR information (.3); conference with co-counsel regarding same (.4).	0.70
	SAJ	B190	A103	Continue to work on V10 mediation statement and issues to be discussed with mediator (3.2); work on scheduling mediator call and zoom regarding going forward after Plaintiffs mediator meeting and request for conference call with mediator and topics (0.5).	3.70
12/13/2022	SAJ	B120	A107	Conference with co-counsel regarding meeting with debtor and asset analysis (0.5); work on recovery of deposition of debtor regarding testimony about assets, property, affiliates. (0.5)	1.00
	SAJ	B190	A103	Continue to work on mediation statement (2.2); conference with Pattis regarding depositions and current status of issues (0.3); continue work on research mediation research and schedule zoom conference with mediator and emails to Ray Battaglia and co-counsel regarding timing and attendance (0.8); prep and attend zoom conference with mediator (0.8).	4.10
12/14/2022	SAJ	B110	A106	Conference with client regarding hacking and disclosures and discuss with client and Battaglia seeking bankruptcy court relief for hacked and stolen confidential information (0.6); determine damages, if any, by third parties attempting de-platforming as a violation of the automatic stay (0.8).	0.80
	SAJ	B110	A107	Conference with co-counsel and conference with consignment lender rep on timing of payment (0.5); conference with FSS counsel and request conference with FSS CRO (0.3).	0.80
	SAJ	B190	A107	Discuss with co-counsel and debtor the appeal strategy and modification to allow appeals to proceed.	0.30
	SAJ	B120	A107	Meeting and discussions continued efforts at asset and liability discovery analysis with co-counsel, financial advisor, debtor.	1.70
	SAJ	B150	A104	Review appointment of creditors committee and compare to memo of Conn v Texas Plaintiffs (circulate).	0.20
	SAJ	B150	A106	Conference with client on committee function, make-up and	

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			representation.	Hours 0.20
	SAJ	B185	A103 Work on FSS contracts regarding \$900,000 due debtor from FSS postpetition for the purchase of product to be sold (0.6); work on contracts potential for celebrity endorsements and celebrity endorsements (0.3).	0.90
	SAJ	B185	A107 Conference with ESG (.4); review details for third party promoted products (.5).	0.90
	SAJ	B190	A103 Continue to work on mediation statement V11 and prepare initial statement for service on mediator.	2.20
12/15/2022	SAJ	B140	A107 Review and comment on order for lift stay agreement with Akin Gump to coordinate entry of judgments for appeal purposes (0.4); email to Andino regarding attorneys fees and appeals and employment (0.2).	0.60
	SAJ	B320	A104 Review and comment on cash collateral and issues of executory contract concerns (0.4); send demonstrative on potential post-petition contracts including celebrity endorsement income and reporting all sources of income in MOR and to estate (0.6).	1.00
	SAJ	B190	A103 Draft/revise summary for mediation after conference with mediator (1.2); work on summary "driving issue" in mediation (0.3); secondary issue of claims objections (0.2); and other mediation issues (0.3); begin update to V11 mediation statement (0.4).	2.40
12/16/2022	SAJ	B110	A104 Review/analyze and comment on witness list and related exhibits including new budget and does not deal with salary.	1.00
	SAJ	B185	A103 Draft/revise and circulate demonstrative on post petition contract negotiations and request a copy of Celebrity Endorsement contract.	1.00
	SAJ	B160	A107 Notice to Norm Pattis (Conn appeal counsel) that fee is likely to be hourly cc: Driver and conference with Pattis.	0.40
	AO	B110	A105 Conference with Shelby Jordan regarding preparation for hearing on 12/19 in case Jordan cannot attend.	0.60
12/19/2022	SAJ	B410	A106 Meeting with client and co-counsel to work on all outstanding administrative and reporting issues dealing with new financial advisors requests (1.0); discuss and review the MOR filings by FSS and discuss the confusing issues created by the delayed accounting and systems of FSS CRO and discuss issues with the FSS CRO Patrick McGill (0.4); call from Ray Battaglia regarding cash collateral in FSS and discuss with client the continued refusal to restore the contract rate salary and alternatives (0.4).	1.80

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				Hours
	SAJ	B140	A101 Prepare with client and co-counsel regarding hearings on cash collateral motion and prepare debtor on responses to Court's questions, if nay, at hearing.	2.60
	SAJ	B140	A106 Meeting with client and review issue of relief from stay, payment of percent of costs of appeal by this estate and by FSS and discuss reference to appellate counsel and restrictions on fees and alternatives if cash flow cannot be maintained.	1.00
	SAJ	B160	A103 Work on Jordan & Ortiz application to employ and prepare for filing.	0.80
	SAJ	B190	A103 Finish intro of V12 mediation statement and circulate to co-counsel.	0.80
	AO	B110	A105 Attend hearings and prepare memo for circulation to debtor and counsel.	1.50
	SAJ	B110	A103 Prepare the initial debtor's conference form and circulate (0.6); prepare and attended with debtor and co-counsel the initial debtor's conference (0.6)	1.20
12/20/2022	SAJ	B210	A107 Conference regarding FSS and operations for Oct Nov 2022 and discussion of operations and disclosures of extremely confidential information in morning debtor conference regarding impact of confidential disclosures and impact of Debtor's estate by de-platforming (2.0); work on status of FSS and its CRO and decisions to delay operations issues and employment agreement (0.4); requested accounting budgeting of FSS for January and February (0.2).	2.60
	SAJ	B160	A103 Prepare final draft of Fee Application and circulate (1.2); work on interim order for fee payments (1.1).	2.30
	SAJ	B180	A107 Request FSS action to seek preference payments and issues to be raised in mediation (0.5); discuss and determine whether funding of cash by Jones pre-petition as basis of preference by Jones estate (0.7); research punitive sanctions as a preference payment (0.5).	1.70
12/21/2022	CRM	B160	A103 Review and revise Shelby Jordan fee application, order and declaration; file and serve same.	1.00
	SAJ	B210	A106 Review/analyze email from Zensky regarding donations and email to debtor forwarding Zensky email and work on summary (0.7); conference with debtor and emails to co-counsel on information gathering and outline of response (0.3); review with Pattis donation accounts and accounting (0.2).	1.20

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				Hours
SAJ	B160	A103	Finalize and file retention application for Jordan & Ortiz.	0.80
SAJ	B160	A106	Conference with client regarding interim payments and income funding (0.4); emails to co-counsel to prepare FSS form of interim compensation and send word version (0.6).	1.00
SAJ	B185	A101	Work on preparation for hearing on summary of reasons for executory employment contract of Jones with FSS (1.2); send full financial summary of pre-payments by Jones of FSS expenses without reimbursements and work on issues of Jones administrative expense claims of FSS (1.0); send memo on "indemnity" set out in employment agreement and issue of statutory right to indemnity due by FSS (0.2).	2.40
SAJ	B190	A103	Work on mediation issues outline for inclusion in mediation statement V13.	1.30
SAJ	B310	A107	Conference with co-counsel regarding hearing conflict on salary issues and other client mediation (0.7); prepare, research and forward outline of proof on debtor background payments and administrative claims due by FSS to Jones including travel, advances for Conn trial, attorneys retainer for FSS and prior counsel to Info-W, InfoW-Health, Prison Planet and for shipment and fulfillment and consignment purchases, etc. and research on right to indemnity from FSS (2.0).	2.70
SAJ	B110	A106	Review PQPR sales reconciliation and discuss with client issues of accounting and reporting (0.6); discuss status of consignment of Platinum products to be sold by FSS and how disbursements of those proceeds will be handled including ESG agent handling (0.7).	1.30
SAJ	B110	A104	Email and review the notice of hearing docket 76 for assumption/rejection of employment agreement.	0.30
SAJ	B160	A103	Complete declaration of disclosure of fees paid in year before bankruptcy and work on final copies of fee application and final draft of interim fee payments and filing (1.10).	1.10
SAJ	B190	A107	Conference with Norm Pattis regarding appellate points, status of appeal issues and status of notice of appeal post judgment (0.4); edits and thoughts sent to Pattis (0.6).	1.00
SAJ	B190	A105	Conference with client regarding appeal and Texas appellate issues (0.6); receive and review memorandum of decision entered by Judge Belis in Connecticut and discuss with debtor (0.4).	1.00
SAJ	B190	A107	Email to co-counsel regarding Rule 2004 examination and Zensky demands and regarding Rule 2004 notice (0.4); gather and forward to co-counsel the documents previously furnished to the Sub-V Trustee voluntarily marked "Mediation Privileged"	



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					Hours
			(1.5)		1.80
12/27/2022	SAJ	B210	A107	Zoom conference call with DIP lender attorney and co-counsel (0.7); review and discuss mediation ordered and the extension of FSS dischargeability deadline and both documents application to this debtor (0.5).	1.20
	SAJ	B410	A107	Email and conference with co-counsel regarding publication of deposition testimony by Plaintiffs and request of Committee Counsel to assist in pulling down.	0.30
	SAJ	B120	A104	Review/analyze and verify return of quitclaim deeds and title to Jones of the Travis Lake House and the Guadalupe County 124 Acres from the 2022 appeal bond trust (0.2); forward to financial officers for inclusion in schedules and verify filing in the deed records for return of assets to the estate (0.4).	0.60
	SAJ	B160	A107	Review email from co-counsel regarding UST question about J&O representation of any parties in interest to Jones "in other matters" and email to co-counsel replying "none" in any matter.	0.20
	SAJ	B190	A107	Email and conference with co-counsel on mediation order that must be approved by Plaintiffs counsel.	0.30
	SAJ	B310	A104	Review/analyze status of loan and debtor's guaranty with security state bank of crawford (0.2); conference with client (0.1); request copies of loan documents and location of loan collateral (Winnebago travel vehicle) (0.1).	0.40
12/28/2022	SAJ	B110	A103	Work on outline of issues to consider in salary motion and evidence (0.4); work on issue of confidentiality to avoid matters of production sent to the news and press (0.3); email to and from co-counsel regarding need for confidentiality agreement in response to David Zensky (0.3).	1.00
	SAJ	B410	A104	Review/analyze order on FSS extension of the deadline for dischargeability (0.3); send email to co-counsel regarding preparation for V13 outline of all issues for mediation statement (0.3).	0.50
	SAJ	B160	A107	Research and respond to UST questions about related party of affiliate representation (response, none) review IOLTA and source and use, have conflicts check re-run.	0.70
	SAJ	B180	A107	Emails to co-counsel and Battaglia regarding need to consider bringing the avoidance actions.	0.60
	SAJ	B190	A104	Review/analyze two orders sent by Akin Gump on mediation send edit thoughts to co-counsel (0.3); work on dischargeability research section for mediation statement V14 (0.7). Total Time Billed 1.00	1.00



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Hours

12/30/2022	SAJ	B210	A107	Conference with co-counsel update and discussion of all pending matters (0.4); email to debtor and call to debtor regarding email questions raised (0.6).	1.00	
				For Current Services Rendered	130.60	77,362.50

## Recapitulation

<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
SHELBY A. JORDAN	Partners	126.40	\$600.00	\$75,840.00
ANTONIO ORTIZ	Partners	2.10	475.00	997.50
CHRYSTAL MADDEN	Paralegals	2.10	250.00	525.00

12/30/2022	B110	E111	12/5/22 - The Grove - Working lunch for Crissie Stephenson, Vickie Driver, Harold Kessler, Allison Gerard	126.04
12/30/2022	B110	E111	12/6/22 - Panera - Working lunch for Crissie Stephenson, Vickie Driver, Harold Kessler, Bob Schleizer, Shelby Jordan, Allison Gerard	199.85
12/31/2022	B110	E112	CSC - Recording Fees for Travis Co and Guadalupe County	91.98
12/31/2022	B110	E124	Parking - Hearing in Travis Co	15.00
12/31/2022	B110	E132	Bankruptcy Photocopies (.20 per page)	7.30
12/31/2022	B110	E124	Computer Research - Lexis	66.48
			Total Expenses	506.65
			Total Current Work	77,869.15
			Balance Due	<u>\$77,869.15</u>

Task Code Summary

	<u>Fees</u>	<u>Expenses</u>
B110 Case Administration	20742.50	506.65
B120 Asset Analysis and Recovery	5220.00	0.00
B140 Relief from Stay/Adequate Protection Proceedings	3300.00	0.00
B150 Meetings of and Communications with Creditors	240.00	0.00
B160 Fee/Employment Applications	4630.00	0.00
B180 Avoidance Action Analysis	1380.00	0.00
B185 Assumption/Rejection of Leases and Contracts	4080.00	0.00
B190 Other Contested Matters (excluding assumption/rejection motions)	19830.00	0.00
B195 Non-Working Travel	1560.00	0.00
B100 Administration	60,982.50	506.65
B210 Business Operations	4800.00	0.00
B200 Operations	4,800.00	0.00
B310 Claims Administration and Objections	7260.00	0.00
B320 Plan and Disclosure Statement (including Business Plan)	600.00	0.00
B300 Claims and Plan	7,860.00	0.00

JONES, ALEX

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Bankruptcy

		<u>Fees</u>	<u>Expenses</u>
B410	General Bankruptcy Advice/Opinions	3720.00	0.00
B400	Bankruptcy-Related Advice	3,720.00	0.00

Your trust account #1 balance is

Opening Balance	\$146,790.16
Closing Balance	\$146,790.16

\*The entry N/C signifies time spent for which there will be no charge.\*

**EXHIBIT “B”****TASK CODES**

<b><u>CATEGORIES</u></b>	<b><u>ATTORNEY TIME</u></b>	<b><u>PARALEGAL TIME</u></b>
B110 Case Administration	34.9	0.50
B120 Asset Analysis and Recovery	8.70	
B130 Asset Disposition	0.00	
B140 Relief from Stay/Adequate Protection	5.50	
B150 Meetings of & Communications with Creditors	0.30	
B160 Fee/Employment Applications	7.30	1.00
B170 Fee/Employment Objections		
B180 Avoidance Action Analysis	2.30	
B185 Assumption/Rejection of Executory Contracts	6.80	
B190 Other Contested Matters	32.80	0.60
B195 Non-Working Travel	2.60	
B210 Business Operations	8.00	
B220 Employee Benefits/Pensions	0.00	
B230 Financing/Cash Collections	0.00	
B240 Tax Issues	0.00	
B250 Real Estate	0.00	
B260 Board of Directors Matters	0.00	
B310 Claims Administration and Objections	12.10	
B320 Plan and Disclosure Statement	1.00	
B410 General Bankruptcy Advice/Opinions	6.20	
B420 Restructurings		
<b>TOTALS:</b>	<b>128.50</b>	<b>2.10</b>